AEMO – Metering Services Review Package 1 Consultation Paper

Attachment to the Energy Queensland submission

AEMO questions	Energy Queensland response
QUESTION 1 (LMRP) What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Energy Queensland's preferred format is YYYY. It is our view that this is the simplest format and could most easily be incorporated into administrative processes.
QUESTION 2 (LMRP) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Energy Queensland is of the view that the use of the Blind Update Tool (BUT) is adequate to update the Legacy Meter Retirement Plan (LMRP) field.
QUESTION 3 (LMRP) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Energy Queensland is of the view that AEMO coordination is required for DNSPs to load LMRP into Market Settlement and Transfer Solutions (MSATS) from May 2025 to 29 June 2025 to ensure identified update limits are effectively applied and managed (for example, where a MSATS limit of 400k National Metering Identifiers (NMIs) per day is applied).
QUESTION 4 (LMRP) Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Energy Queensland is of the view that no specific standing data quality reports (SDQR) are required to be created for participants to meet their procedural obligations for LMRP. However, if SDQR were to be required, we see value in it being made available for all participants and to incorporate components such as: • completion reporting against LMRP year targets; and • defect management reporting, including notice dates and type of notification.

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QUESTION 5 (LMRP) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Energy Queensland does not have any feedback on this consultation question.
QUESTION 6 (Defects) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Energy Queensland agrees with the proposed defect flag. However, while we agree with the proposal, we are of the view that there would be greater value to all participants if the flag also identified the defect type. This could be done by having an enumerated value for the indicator as opposed to a simple yes/null indicator. This would allow the presence of a defect and the defect type to be captured in a single field where the enumerated value would identify pre-agreed defect types.
QUESTION 7 (Defects) Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Energy Queensland broadly agrees with the proposed approach.
QUESTION 8 (Defects) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Energy Queensland broadly agrees with the proposed enumerations.

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QUESTION 9 (Defects) Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Energy Queensland is of the view that no specific SDQR are required to be created for participants to meet their procedural obligations for defects. However, as stated above, if SDQR were to be required, we see value in it being made available for all participants and to incorporate the components suggested in response to Question 4.
QUESTION 10 (Defects) Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Energy Queensland's preferred option is Option 1. We are of the view that this is the best approach as it is automated and will reduce the risk of sync issues between flags and status. Further, due to the meter exchange only being able to be completed following the rectification of any site defects, the option to update the relevant defect fields automatically minimises any risk of participants failing to update or incorrectly updating these fields. In some scenarios the updating of a meter exchange in MSATS may also be actioned via the completion of a CR3050/51 to remove the legacy meter and a CR3000/01 to install the smart meter. We would appreciate clarification from AEMO as to whether the completion of this pair of transactions (actioned together) would also trigger the defect fields to be nullified?
QUESTION 11 (Defects) Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	As stated above, our preferred option is the proposed Option 1. However, we would appreciate further clarification as to whether AEMO has considered a mechanism to notify all Retailers of a defect, where a defect has been identified at a shared fuse installation by the original attending Metering Coordinator that will impact all NMIs. Additionally, we are of the view that there would be value to participants in having the defect flag to also identify the defect type and for a simplified process for tracking customer notices to be managed by retailers.

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QUESTION 12 (Retailer of Last Resort processes) Do you agree with the removal of the RoLR reports as proposed? If not, why?	Energy Queensland agrees with the removal of the Retailer of Last Resort reports as proposed.
QUESTION 13 (Issues and Change Forms – ICF 077) Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Energy Queensland agrees that the proposed changes will achieve the desired objective.
QUESTION 14 (Issues and Change Forms – ICF 078) Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Energy Queensland agrees that the proposed changes will achieve the desired objective.
QUESTION 15 (Issues and Change Forms – ICF 079) Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Energy Queensland agrees that the proposed changes will achieve the desired objective.
QUESTION 17 (Embedded Network Settlement Anomalies) Do you agree with the proposed changes to limit: o the ability of ENMs to activate and de-activate NMI(s) retrospectively	Energy Queensland is of the view that, in general, the proposed changes would assist in managing the identified issues, however, we would appreciate further information on the investigations AEMO has completed in formulating the proposed changes. This would better allow participants to fully understand the issues, possible solutions and any flow on impacts to other participant activities.

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o the ability of MDPs to activate and de-activate data streams in embedded networks retrospectively If not, why?	Of particular concern, is the lack of detail around where the change would apply and how it would be implemented. The current proposal appears to be a blanket ruling that no retrospective changes to NMI or data stream status will be allowed for an embedded/child connection point. We are of the view that there may be valid reasons that an Embedded Network Manager and a Metering Data Provider may be required to make retrospective changes to NMI or data stream status. For example, this could be the result of an error correction or updates resulting from information provided by other participants after agreements or changes have been made. Practically, most, if not all, these status changes are actioned retrospectively due to business and system process flows. We would appreciate further clarification from AEMO as to whether the proposed changes are intended to be restricted to specific NMI/Customer types (e.g. Small Generation Aggregators) but would not be applicable to other embedded connection points?